



# Diversity, Equity, and Inclusion Policy

## Document Version 1.0

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| <b>Policy Owner:</b>       | Mark Cornish, Director |
| <b>Approved by:</b>        | Directors              |
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## Version Control

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| 1.0                | 01/02/25             | Creation, replacing old policy.          | Mark Cornish            | Board              | 26 Feb 2025          |
|                    |                      |                                          |                         |                    |                      |
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## 1. DEFINITIONS

| Word / Term                      | Definition                                                                                                                          |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| <b>TAFC, us, our, or we etc.</b> | Means Tonbridge Angels Football Club Limited, a Community Benefit Society, registered with registered number IPO 32445              |
| <b>Protected Characteristics</b> | Has the meaning set out in section 4 of this Policy.                                                                                |
| <b>Unconscious Bias</b>          | Has the meaning set out in section 4 of this Policy.                                                                                |
| <b>Unlawful Discrimination</b>   | Has the meaning set out in section 4 of this Policy.                                                                                |
| <b>Our People</b>                | All directors, officials, staff, volunteers, management, players, or contractors as applicable, and working for or engaged by TAFC. |

## 2. PURPOSE AND SCOPE

TAFC is committed to encouraging and promoting diversity, equity, and inclusion in all aspects of our football, work and business. We are committed to ensuring that all Our People feel included and respected therefore able to give their best. The purpose of this Policy is to promote this aim.

We recognise that promoting an internal culture that values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace is vital to the integrity and wellbeing of TAFC.

We also recognise the value that diversity, equity and inclusion makes good business sense. As a diverse and inclusive business, we are well equipped to attract and retain top talent and foster a culture of innovation.

This policy does not form part of any employee's contractual terms with TAFC and may be amended at any time.

### What is Diversity, Equity, and Inclusion?

**Diversity** – celebrating and encouraging difference. Each person is an individual with visible and non-visible differences, and these are respected.

**Equity** – treating people fairly, eliminating discrimination, and ensuring equal access to opportunity.

**Inclusion** – valuing and involving everyone. By respecting differences, visible and non-visible, everyone can feel valued for their contributions which is beneficial not only for the individual but for TAFC as well.

Or, to put it another way:

*“Diversity is being asked to the party; inclusion is being asked to dance”*

Verna Myers, VP Inclusion Strategy @ Netflix

Diversity, equity, and inclusion are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed.

### 3. TAFC COMMITS TO:

1. Encouraging diversity, equity, and inclusion throughout the club as good practice. Football should be enjoyed by anyone who wants to participate in it.
2. Promoting diversity, equity, and inclusion and ensuring that we do not discriminate in our recruitment processes and procedures.
3. Making decisions concerning Our People based on ability and merit.
4. The FA Charter Standard Equality Policy, as enhanced by this Policy.
5. Confronting and eliminating discrimination at the club, creating and maintaining an environment free of bullying, harassment, victimisation, and unlawful discrimination of any kind, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training all Our People about their rights and responsibilities under this Policy. This will also include training on Unconscious Bias (see further below). Responsibilities include Our People conducting themselves to help TAFC provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination. See our Anti-Bullying and Harassment Policy for further information.

6. Taking seriously any complaints of bullying, harassment, victimisation and unlawful discrimination by Our People, customers, suppliers, visitors, the public and any others in the course of the TAFC's work activities.

For employees, such acts will be dealt with as misconduct under the TAFC's disciplinary procedures, and appropriate action will be taken. Complaints could amount to gross misconduct and lead to dismissal. Further, some forms of harassment may amount to both unlawful discrimination and criminal matters in some jurisdictions in which we operate.

7. Providing opportunities for training, development, and progression for all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of TAFC.
8. Ensuring we do not Unlawfully Discriminate in the arrangements we make for:
  - recruitment
  - pay and benefits
  - terms and conditions of employment
  - dealing with grievances and discipline
  - dismissal
  - parental leave and flexible working
  - selection for employment, promotion, training, or other developmental opportunities
8. Ensuring that we work to avoid and eliminate Unconscious Bias as a factor in workplace decision making. This includes a commitment to ensuring that the training we provide covers this.

9. Reviewing practices and procedures when necessary to promote fairness and update them and the policy to take account of changes in the law.
10. Where possible, monitoring the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging diversity, equity and inclusion.
11. Ensuring all Our People understand this Policy, and their part to play in promoting and ensuring Diversity, Equity and Inclusion.

## 4. PROHIBITION ON UNLAWFUL DISCRIMINATION

### Protected Characteristics

All Our People, job applicants, customers, and members of the public are entitled to be treated fairly, regardless of:

- age
  - disability
  - marriage or civil partnership
  - pregnancy and maternity
  - race (including colour, nationality, and ethnic or national origin)
  - religion or belief
  - sex
  - sexual orientation
  - gender reassignment
- and together referred to in this policy as Protected Characteristics.

### Unlawful Discrimination

**TAFC prohibits all forms of Unlawful Discrimination.** There are different types of Unlawful Discrimination as follows:

**Direct Discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.

**Indirect Discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time may adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

**Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

**Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about Unlawful Discrimination or Harassment.

**Disability Discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Note that discrimination may be unintentional; a person may not even be aware that they are discriminating, and it may still amount to discrimination.

### **Unconscious Bias**

How a person thinks can depend on their life experiences and sometimes they have beliefs and views about other people that might not be right or reasonable. This is known as 'unconscious bias' and includes when a person thinks:

- better of someone because they believe they're alike
- less of someone because that person is different to them, for example, they might be of a different race, religion or age.

This means they could make a decision influenced by false beliefs or assumptions. Sometimes it's also called 'stereotyping'. Everyone can think in a way that involves unconscious bias at some point, but it's important to be aware of it and not let it affect behaviour or decisions.

Unconscious Bias can lead to decisions and actions that amount to Unlawful Discrimination.

We recognise the potential for Unconscious Bias to arise within TAFC and decision making, particularly in the context of Our People being from a wide range of backgrounds and cultures, and strive to identify and minimise its impact.

## **5. EQUALITY OF OPPORTUNITY IN RECRUITMENT AND INTERNALLY**

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

## **6. DISABILITY**

We encourage all Our People and job applicants to disclose information relating to any disability to their manager and/or HR as appropriate. This will enable TAFC to work with those individuals to understand and agree to any reasonable adjustments needed in the workplace. What constitutes a reasonable adjustment is inherently subjective and will be person specific.

Examples of reasonable adjustment include:

- Changes to the physical working environment.
- Purchasing additional equipment, software, or hardware.
- Changes to the way things are done.
- Additional support for the individual.

TAFC will consider all requests, with support from specialist advisors when appropriate, linked to an individual's disability and seek to accommodate as far as possible.

The final decision will carefully consider if the adjustment:

- Will remove or reduce the disadvantage for the person with the disability.
- Is practical to make.
- Is affordable by the employer or business.
- Could harm the health and safety of others.

All requests and decisions will be documented and retained on the individual's personnel file and reviewed as required.

## **7. BREACHES OF THIS POLICY**

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our disciplinary procedures. Serious cases of deliberate discrimination may amount to gross misconduct, and potentially dismissal.

If Our People believe that they have suffered discrimination they can raise the matter through this Policy, our Anti-harassment and Bullying Policy and our Grievance Policy. Complaints will be treated in confidence and investigated as appropriate.

Our People must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

## **8. ROLES AND RESPONSIBILITIES**

All Our People are expected to know and understand the content of this Policy and abide by and promote the rules and principles it contains. Our People should be pro-active in encouraging Diversity, Equity and Inclusion, and preventing unlawful discrimination.

All Our People should understand that they, as well as TAFC, can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their work with us, against Our People, customers, suppliers and the public.

This Diversity, Equity and Inclusion Policy is fully supported by senior management. The Directors and senior management are primarily responsible for designing, implementing, overseeing, and controlling the systems, controls, and arrangements in place in relation to this Policy. The Policy is controlled by the Directors, and subject to review and amendment by them from time to time.

## **9. RECORD KEEPING**

Information about a complaint alleging unlawful discrimination by or about any of Our People may be placed on personnel files, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.